

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

KIMBERLY GENEREUX,	)	
Plaintiff,	)	
v.	)	
COLUMBIA SUSSEX CORPORATION	)	
d/b/a WESTIN CASUARINA HOTEL,	)	
STARWOOD HOTELS & RESORTS	)	
WORLDWIDE, INC., WESTIN LICENSE	)	
COMPANY, WESTIN LICENSE	)	Civil Action No. 05-CV-10879-JLT
COMPANY NORTH, WESTIN	)	
MANAGEMENT COMPANY NORTH,	)	
INC., WESTIN MANAGEMENT	)	
COMPANY EAST, WESTIN NORTH	)	
AMERICA MANAGEMENT COMPANY,	)	
INC., GALLEON BEACH RESORT, LTD.,	)	
and CORPORATE DEFENDANTS X1-	)	
100,	)	
Defendants.	)	

**DEFENDANT STARWOOD HOTELS & RESORTS WORLDWIDE, INC.'S SWORN  
STATEMENT PURSUANT TO LOCAL RULE 26.1(B)**

Pursuant to Local Rule 26.1(b) of the United States District Court for the District of Massachusetts, defendant Starwood Hotels & Resorts Worldwide, Inc. (hereinafter “Starwood Corp.”), hereby provides its sworn statement as follows:

**A. Individuals Likely To Have Discoverable Information Regarding The Claims Or Defenses In This Action**

At this time, Starwood Corp. believes that the following persons may have discoverable information concerning the matters in controversy:

1. Plaintiff Kimberly Genereux.

2. Daphne Hampson, former Director of Franchise Operations for Starwood Hotels & Resorts Worldwide, Inc. Ms. Hampson's address is 10660 Hollymount Dr., Richmond, British Columbia, V7E4Z2. Ms. Hampson may have spoken with employees at the Westin Casuarina Hotel about the incident that is the subject of this case.

3. Steven Sherman, Design Manager, Starwood Hotels & Resorts Worldwide, Inc. Mr. Sherman may be reached through counsel for Starwood Corp. Mr. Sherman may have knowledge about the design of the Westin Casuarina Hotel.

4. Diana Oreck, former employee of Starwood Hotels & Resorts Worldwide, Inc. Starwood Corp. does not know Ms. Oreck's current address but understands that she works at Ritz Carlton/Marriott Hotels, Bethesda, Maryland. Ms. Oreck may have knowledge about the design of the Westin Casuarina Hotel.

**B. Statements**

Starwood Corp. has obtained no written statements from opposing parties, or from any officers, directors, or employees thereof, regarding the subject matter of the claim or defenses in this case.

C. Investigations

Starwood Corp. is not aware of any governmental or agency investigations regarding the matters in controversy.

Signed under the pains and penalties of perjury this 27<sup>th</sup> day of April, 2006.

Starwood Hotels & Resorts  
Worldwide, Inc.

Lynne A. Dougherty

By: Lynne A. Dougherty  
Its: Senior Vice President, Franchise

STARWOOD HOTELS & RESORTS  
WORLDWIDE, INC.

By its attorneys,

/s/ Stephen C. Bazarian

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